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*Counsel for Petitioners*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

VALERIA HERMOSILLO CHAVEZ,  
ERIK ESPARZA, JAMAR SMITH, and  
ANTHONY SIMONEAU, and 7,267 OTHER  
INDIVIDUALS,

Petitioners,

v.

UBER TECHNOLOGIES, INC. AND UBER  
USA, LLC

Respondents.

No. 3:21-cv-09577 (RS)

**SECOND JOINT STIPULATION  
REGARDING STAY OF PENDING  
PROCEEDINGS**

**[Proposed Order Filed Concurrently]**

Action filed: December 10, 2021

Petitioners Valeria Hermosillo Chavez, Erik Esparza, Jamar Smith, and Anthony Simoneau, and 7,267 other individuals (collectively, “Petitioners”) and Uber Technologies, Inc., and Uber USA, LLC (collectively, “Respondents”) hereby stipulate and agree as follows:

WHEREAS, on December 10, 2021, Petitioners filed a Petition for an Order Compelling Arbitration (“Petition”) against Respondents;

WHEREAS, on January 5, 2022, Petitioners filed a Motion to Compel Arbitration, to Stay Parallel Proceedings, and for Other Relief (“Motion”) against Respondents with a hearing date of March 10, 2022;

WHEREAS, on January 31, 2022, Respondents filed an opposition to the Motion to Compel and a Motion to Dismiss the Petition;

WHEREAS, upon completion of the briefing this Court heard argument on the pending motions on March 10, 2022, and currently has the matter under advisement;

WHEREAS, on April 14, 2022, the New York Appellate Division First Department, issued a decision in the pending state litigation between Respondent and the American Arbitration Association (AAA) that relates to fees associated with Petitioners’ arbitrations;

WHEREAS, on April 26, 2022, the Court granted the parties’ Joint Stipulation Regarding Stay of Pending Proceedings pending ongoing discussions between Petitioners and Respondents about the future course of Petitioners’ arbitrations, staying this action until June 6, 2022 and directing the parties to provide a status report to the Court by June 6, 2022 as to the need for further proceedings;

WHEREAS, Petitioners and Respondents remain engaged in ongoing discussions about the future course of Petitioners’ arbitrations and anticipate concluding those discussion within twenty (20) days;

THEREFORE, pursuant to Local Civil Rule 7-12, Petitioners and Respondents, by and through their respective counsel, stipulate and agree that further proceedings in this case should be stayed until June 27, 2022, at which point the parties will provide a further update to the Court as to the need for any further proceedings;

The parties thus respectfully request that the Court continue to stay all proceedings in this matter until June 27, 2022.

**IT IS SO STIPULATED.**

Dated: June 6, 2022

JENNER & BLOCK LLP

By: /s/ Laurie Edelstein

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**FILER'S ATTESTATION**

Pursuant to Local Rule 5-1(i)(3), I attest that concurrence in the filing of this document has been obtained from each of the other signatories shown above and that all signatories have authorized placement of their electronic signatures on this document.

By: /s/ Laurie Edelstein

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UNITED STATES DISTRICT COURT  
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UBER TECHNOLOGIES, INC. AND UBER  
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Respondents.

No. 3:21-cv-09577 (RS)

**[PROPOSED] ORDER GRANTING  
SECOND JOINT STIPULATION  
REGARDING STAY OF PENDING  
PROCEEDINGS**

Action Filed: December 10, 2021

1 WHEREAS, on December 10, 2021, Petitioners filed a Petition for an Order Compelling  
2 Arbitration (“Petition”) against Respondents;

3 WHEREAS, on January 5, 2022, Petitioners filed a Motion to Compel Arbitration, to  
4 Stay Parallel Proceedings, and for Other Relief (“Motion”) against Respondents with a hearing  
5 date of March 10, 2022;

6 WHEREAS, on January 31, 2022, Respondents filed an opposition to the Motion to  
7 Compel and a Motion to Dismiss the Petition;

8 WHEREAS, upon completion of the briefing this Court heard argument on the pending  
9 motions on March 10, 2022, and currently has the matter under advisement;

10 WHEREAS, on April 14, 2022, the New York Appellate Division First Department,  
11 issued a decision in the pending state litigation between Respondent and the American  
12 Arbitration Association (AAA) that relates to fees associated with Petitioners’ arbitrations;

13 WHEREAS, on April 26, 2022, the Court granted the parties’ Joint Stipulation Regarding  
14 Stay of Pending Proceedings pending ongoing discussions between Petitioners and Respondents  
15 about the future course of Petitioners’ arbitrations, staying this action until June 6, 2022 and  
16 directing the parties to provide a status report to the Court by June 6, 2022 as to the need for  
17 further proceedings;

18 WHEREAS, Petitioners and Respondents remain engaged in ongoing discussions about  
19 the future course of Petitioners’ arbitrations and anticipate concluding those discussion within  
20 twenty (20) days;

21 WHEREAS, pursuant to Local Civil Rule 7-12, Petitioners and Respondents, by and  
22 through their respective counsel, stipulate and agree that further proceedings in this case should  
23 be stayed until June 27, 2022, at which point the parties will provide an update to the Court as to  
24 the need for any further proceedings;

25 THEREFORE, good cause having been shown, IT IS HEREBY ORDERED that all  
26 proceedings in this matter are hereby stayed until June 27, 2022, by which time the parties are  
27 directed to provide a status report to the Court with respect to the future course of proceedings in  
28 this case.

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

Dated: June \_\_\_, 2022

\_\_\_\_\_  
The Honorable Richard G. Seeborg  
United States District Court Judge

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